

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
JIHAD ANTHONY ZOGHEIB,  
Defendant.

Case No.: 2:16-cr-00057-LRH-VCF-1

**STIPULATION AND ORDER TO CONTINUE DUE DATES FOR FILING OF  
SENTENCING MEMORANDA**  
**(Fourth Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Defendant JIHAD ANTHONY ZOGHEIB, by and through his attorney (Richard J. Pocker, Esq. of the law firm of Boies Schiller Flexner LLP), and the Plaintiff UNITED STATES OF AMERICA (hereinafter, "the Government"), by and through its attorney (Assistant United States Attorney Patrick Burns), that the deadline for the filing of Defendant's sentencing memoranda be extended and continued to and including May 27, 2019. The Government shall have to and including June 4, 2019 in which to file its responsive sentencing memorandum to that of Defendant ZOGHEIB.

This Stipulation is entered into for the following reasons:

1       1. The present case was most recently set for sentencing on May 15, 2019, having  
2 been most recently continued from March 6, 2019. On May 6, 2019, the Court granted the  
3 Government's Emergency Motion to Continue Sentencing Date, but a new sentencing date has  
4 not yet been set. The Presentence Investigation Report was disclosed on January 30, 2019, in  
5 anticipation of the prior March sentencing hearing. On April 9, 2019 Defendant ZOGHEIB  
6 filed his Objections to the Presentence Investigation Report. Further investigation of  
7 background facts revealed additional errors in the Report, and Defendant ZOGHEIB filed his  
8 supplemental objections on April 22, 2019.

9       2. In addition to the filing of objections to the Presentence Investigation Report,  
10 Defendant ZOGHEIB intends to file a Sentencing Memorandum to assist the Court in  
11 determining the appropriate sentence to impose. The Government also contemplates filing a  
12 responsive memorandum setting forth its sentencing arguments, or other suitable pre-  
13 sentencing filings. While ordinarily such memoranda are filed with the Court on the same date  
14 as the objections to the Presentence Investigation Report, the parties request an extension of the  
15 deadline for the filing of Defendant ZOGHEIB's sentencing memorandum to and including  
16 May 27, 2019. The Government's response to the sentencing memoranda will be due on June  
17 4, 2019. The sentencing date will be on the date to be determined by the Court.

18       3. Defendant ZOGHEIB is presently incarcerated, serving a sentence imposed in  
19 the Nevada state courts, and does not object to these specific extensions and continuances, now  
20 that his May 15, 2019 sentencing date has been continued.

21       4. The additional time requested herein is not sought for purpose of delay, but  
22 merely to allow counsel sufficient time within which to complete efforts relevant to making  
23 their respective sentencing presentations, in this unexpectedly complicated case. The requested  
24 extension, in light of the continuance of the sentencing date, will not adversely affect the  
25 briefing and disposition of objections to the Presentence Investigation Report and the  
26 sentencing hearing.

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1           5. This is the fourth request to continue the dates relative to the sentencing process,  
2 and the fourth request to continue the dates affected by the present Stipulation.

3           DATED this 7<sup>th</sup> day of May, 2019.

4 BOIES SCHILLER FLEXNER LLP

NICHOLAS A. TRUTANICH  
United States Attorney

5 By: /s/ Richard J. Pocker

6 RICHARD J. POCKER, ESQ.  
7 Counsel for Jihad Anthony Zogheib

By: /s/ Patrick Burns

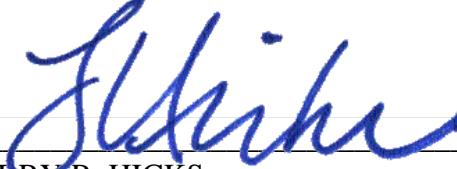
PATRICK BURNS, ESQ.  
Assistant United States Attorney

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9           **ORDER**

10          Based on the pending Stipulation of counsel, and good cause appearing,  
11          IT IS HEREBY ORDERED THAT the deadline for the filing of Defendant  
12          ZOGHEIB's sentencing memoranda be continued to May 27, 2019. The Government shall  
13          have to and including June 4, 2019 in which to file a response to Defendant ZOGHEIB's  
14          sentencing memorandum.

15          DATED this 9th day of May, 2019.

16            
17          LARRY R. HICKS  
18          UNITED STATES DISTRICT JUDGE